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10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION  
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14 UNITED STATES OF AMERICA,	) No. CR 20-70698 JCS
15 Plaintiff,	)
16 v.	) STIPULATION AND <del>PROPOSED</del> ORDER
17 SANDRA ANN ZUNIGA,	) WAIVING TIME UNDER SPEEDY TRIAL ACT
18 Defendant.	) AND RULE 5.1
19	)

1 With the agreement of the parties, and with the consent of the defendant, the Court enters this  
2 order continuing the preliminary hearing date of August 20, 2020, at 9:30 a.m., to September 24, 2020,  
3 at 9:30 a.m. and documenting the defendant's waiver of the preliminary hearing date under Federal Rule  
4 of Criminal Procedure 5.1 and the exclusion of time under the Speedy Trial Act, 18 U.S.C. 3161(b).

5 The parties agree, and the Court finds and holds, as follows:

6 1. The defendant is currently charged by criminal complaint. The defendant is not in  
7 custody, having been released on an unsecured bond of \$250,000 on June 10, 2020.

8 2. The defendant agrees to an exclusion of time under the Speedy Trial Act, 18 U.S.C.  
9 3161(h)(7)(A) & (B)(iv) to provide reasonable time necessary for effective preparation, taking into  
10 account the exercise of due diligence.

11 3. The defendant waives the time limits of Federal Rule of Criminal Procedure 5.1 for  
12 preliminary hearing.

13 4. Counsel for the defense believes that postponing the preliminary hearing is in her client's  
14 best interest, and that it is not in her client's interest for the United States to indict the case during the  
15 timeline established in Rule 5.1.

16 5. The Court finds that, taking into the account the public interest in the prompt disposition  
17 of criminal cases, these grounds are good cause for extending the time limits for a preliminary hearing  
18 under Federal Rule of Criminal Procedure 5.1. Given these circumstances, the Court finds that the ends  
19 of justice served by excluding the period from August 20, 2020 through September 24, 2020, outweigh  
20 the best interest of the public and the defendant in a speedy trial. 18 U.S.C. 3161(h)(7)(A).

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